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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Before the

FEDERAL COMMUNICATIONS COMMISSION

Washington, D.C. 20554

In the Matter of	)	
	)	
Amendment of Section 73.202(b)	)	MM Docket No.
Table of Allotments	)	RM-
FM Broadcast Stations	)	
(Shelton, Washington)	)	

To: Chief, Allocations Branch
Policy and Rules Division
Mass Media Bureau

DOCKET FILE COPY ORIGINAL

PETITION FOR RULE MAKING

Sound Broadcasting, Inc. ("SBI"), licensee of Station KMAS(AM), Shelton, Washington, by its counsel, hereby submits a petition to amend the FM Table of Allotments, Section 73.202(b) of the Commission's Rules, to allot Channel 233A to Shelton, Washington, as its first FM service. SBI will file an application for a new FM broadcast station at Shelton if the channel is allotted and, if authorized, will construct the station.

1. Shelton is listed in the 1990 U.S. Census with a population of 7,241 persons. Shelton is located in Mason County, which has a 1990 U.S. Census population of 38,341. Shelton has one AM station.

2. The proposed allotment of Channel 233A to Shelton complies with the distance separation requirements of Section

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73.207 of the Commission's Rules to all domestic stations. See attached Engineering Statement of Communications Technologies, Inc. The channel study reveals a short spacing to a Canadian allotment on Channel 233C at Vancouver, British Columbia. Pursuant to the U.S. Canada Treaty provisions, the engineering analysis reveals no overlap of relevant contours between the proposed Canadian facility on Channel 233C and a Class A allotment on Channel 233 at reference coordinates 47° 14' 00" 123° 18' 00" for Shelton, Washington. Thus, the Shelton proposal meets the applicable technical standards under the treaty.

3. Accordingly, SBI urges the Commission to issue a Notice of Proposed Rule Making to allot Channel 233A to Shelton, Washington, as its first FM service.

Respectfully submitted,

SOUND BROADCASTING, INC.

By: 
Mark N. Lipp

Mullin, Rhyne, Emmons and Topel, P.C.
1000 Connecticut Avenue--Suite 500
Washington, D.C. 20036
(202) 659-4700

Its Counsel

September 6, 1995

ENGINEERING STATEMENT

PREPARED IN SUPPORT OF A

PETITION FOR RULEMAKING

TO AMEND THE TABLE OF

ALLOTMENTS TO ADD CHANNEL 233A

AT SHELTON, WASHINGTON

AUGUST 1995

ENGINEERING STATEMENT

PREPARED IN SUPPORT OF A

PETITION FOR RULEMAKING

TO AMEND THE TABLE OF

ALLOTMENTS TO ADD CHANNEL 233A

AT SHELTON, WASHINGTON

AUGUST 30, 1995

SUMMARY

The following engineering statement has been prepared on behalf of **Sound Broadcasting Inc.** ("**Sound**") in support of its petition to add Channel 233A (94.5 MHz) to the FM Table of Allotments, Section 73.202 of the Commission's Rules and Regulations. The proposal complies with Section 73.207 of the Rules for domestic facilities, with the March 1989 working arrangement "For The Allotment And Assignment Of FM Broadcasting Channels" with Canada and complies with Section 73.315 concerning 70 dBu service to the community of license.

This statement is complete with the following:

Exhibits:

I. Allocation study for Channel 233A, Shelton, Washington.

II. Distance to the 58 dBu (F50,50) contour for the Canadian Proposed use of Channel 233C at Vancouver, British Columbia.

III. Distance to the 40 dBu F(50,10) contour for Channel 233C, Vancouver, B.C.

IV. Distance to the proposed 60 dBu contour for Channel 233A, Shelton, Washington.

V. Distance to the proposed 38 dBu contour for Channel 233A, Shelton, Washington.

Figures:

1. Contour clearance map, expanded scale, showing the Channel 233 allocation with Vancouver, British Columbia.
2. Contour clearance map, full scale.
3. Predicted Shelton, Washington 70 dBu and 60 dBu contours from the proposed reference coordinates.

REFERENCE COORDINATES/TECHNICAL CHARACTERISTICS

The reference coordinates for the proposed Channel 233A allocation at Shelton, Washington are

North Latitude 47 14' 00"

West Latitude 123 18' 00"

The 8 radial AAT for the reference coordinates is 162 meters. The radiation center used for the contour study is, therefore, 262 meters AMSL, 100 meters HAAT.

COMMUNITY CHARACTERISTICS

Shelton is located in Mason County, Washington. 1990 U.S. Census data for the city and county follow:

	Shelton City	Mason County
1990 Census	7,241 persons	38,341 persons

There are no FM stations currently licensed to Shelton. One standard broadcast station, KMAS, 1030 kHz, 10 kW day, 1 kW night is licensed to Shelton.

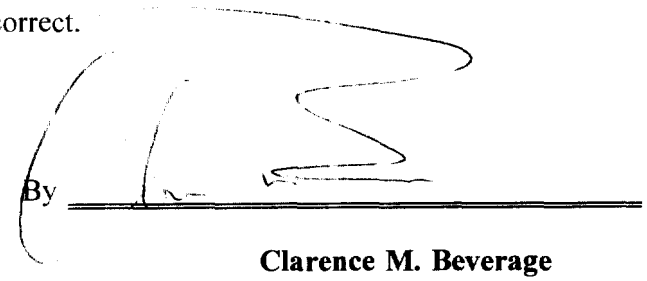
ALLOCATION CONSIDERATIONS

All eighty commercial FM channels were searched in an effort to find a channel which could be allocated to Shelton while meeting both domestic and international minimum distance separation standards. No channel was found which would meet this criteria. However, channel 233A does meet all the Section 73.207 minimum distance separation standards to domestic stations. With respect to Canada, **Sound** requests that the Commission negotiate a "Specially coordinated short-spaced allotment" with Canada for the proposed Channel 233A allotment. The allotment provides full 38 dBu contour protection to the proposed Canadian facility 58 dbu service contour. Applications for Channel 233A at Shelton must demonstrate that the proposed facility will not receive prohibited 40 dBu contour overlap from Channel 233C, Vancouver, British Columbia. The reference coordinates selected herein comply with all pertinent contour overlap requirements.

CONCLUSION

The Channel 233A allotment proposed for Shelton, Washington meets all applicable Commission Technical standards and is in full compliance with applicable contour protection standards concerning Channel 233C, Vancouver, British Columbia.

The foregoing was prepared on behalf of **Sound Broadcasting, Inc.** by Clarence M. Beverage of *Communications Technologies, Inc.*, Marlton, New Jersey, whose qualifications are a matter of record with the Federal Communications Commission. The statements herein are true and correct of his own knowledge, except such statements made on information and belief, and as to these statements he believes them to be true and correct.



By _____

Clarence M. Beverage
for Communications Technologies, Inc.
Marlton, New Jersey

SUBSCRIBED AND SWORN TO before me,

this 30th day of August, 1995,

Esther G Sperbeck, NOTARY PUBLIC

ESTHER G. SPERBECK
NOTARY PUBLIC OF NEW JERSEY
MY COMMISSION EXPIRES OCT 15, 1997

EXHIBIT I

ALLOCATION STUDY

CHANNEL 233 A 94.5 mHz

SHELTON, WASHINGTON

AUGUST 1995

search of channel 233A+ (94.5 MHz), at N 47 14 0, W. 123 18 0.

Searching Channel 233A+ (94.5 MHz):

CALL	CITY	ST	CHN	CL	S	DIST	SEPN	BRNG	CLEARANCE
ALC	Seattle	WA	231	C	U	104.5	95.0	73.3°	9.5
KMPSFM	Seattle	WA	231	C	L	104.5	95.0	73.3°	9.5
ALC	Long Beach	WA	232	A	U	117.2	72.0	209.3°	45.2
KKEE	Long Beach	WA	232	A	L	117.2	72.0	209.3°	45.2
ALC	Vancouver	BC	233	C		224.7	259.0	3.8°	-34.3
ALC	Vancouver	BC	233	C		237.6	259.0	6.2°	-21.4
ALC	Kelso	WA	233	A	U	121.9	115.0	168.8°	6.9
ALC	Yakima	WA	233	C1	U	226.9	200.0	110.1°	26.9
KATS	Yakima	WA	233	C1	L	226.9	200.0	110.1°	26.9
KUKN	Kelso	WA	233	A	L	114.9	115.0	170.0°	-0.0
KQEMFM	Seaside	OR	234	A	C	146.9	72.0	198.8°	74.9
ALC	Seattle	WA	235	C1	U	86.1	75.0	60.4°	11.1
KUOW	Seattle	WA	235	C1	L	86.1	75.0	60.4°	11.1
ALC	Winlock	WA	236	A	U	87.0	31.0	161.4°	56.0
KITIFM	Winlock	WA	236	A	C	79.6	31.0	164.5°	48.6
ALC	Edmonds	WA	287	C1	U	93.0	21.0	50.2°	72.0
KCMS	Edmonds	WA	287	C1	L	92.9	21.0	50.2°	71.9

EXHIBIT II

DISTANCE TO PROPOSED SERVICE CONTOUR

CHANNEL 233C 75 kW MAXIMUM (DIRECTIONAL ANTENNA)

VANCOUVER, BRITISH COLUMBIA

AUGUST 1995

DISTANCES TO CONTOURS (Kilometers):

Frequency: 94.5000 MHz
Coordinates: N 49 21 29 W 122 57 9
F(50,50) Curves Number of Contours: 1

AZ (degs)	HAAT (m)	ERP (kW)	CONTOUR LEVELS (dBu): 58.0
.0	297	.7500	32.4
5.0	99	.9259	20.3
10.0	-98	1.1204	11.7
15.0	-2	1.3333	12.2
20.0	247	1.5648	35.2
25.0	255	1.8148	36.8
30.0	339	2.0833	42.7
35.0	461	2.3704	50.4
40.0	442	2.6759	50.5
45.0	388	3.0000	48.6
50.0	389	4.4084	52.3
55.0	446	6.0871	58.5
60.0	495	8.0360	64.4
65.0	551	10.2552	70.6
70.0	499	12.7445	69.6
75.0	543	15.5041	74.6
80.0	539	18.5340	76.3
85.0	550	21.8340	78.7
90.0	580	25.4043	81.7
95.0	555	30.8161	82.6
100.0	568	36.7500	85.0
105.0	601	41.8507	87.7
110.0	640	47.2827	90.4
115.0	711	53.9328	94.4
120.0	782	61.0203	98.5
125.0	831	67.0478	101.5
130.0	874	73.3591	104.2
135.0	901	74.1773	105.2
140.0	894	75.0000	105.2
145.0	886	73.2849	104.6
150.0	883	71.5897	104.2

155.0	872	66.1995	102.8
160.0	879	61.0203	102.0
165.0	876	59.6079	101.6
170.0	879	58.2121	101.4
175.0	886	58.8747	101.8
180.0	889	59.5411	102.0
185.0	886	60.9527	102.2
190.0	876	62.3808	102.2
195.0	861	63.8255	102.0
200.0	864	65.2867	102.4
205.0	869	62.3808	102.0
210.0	873	59.5411	101.5
215.0	878	55.6637	100.8
220.0	885	51.9168	100.2
225.0	892	49.5727	99.8
230.0	899	47.2827	99.5
235.0	890	50.1230	99.9
240.0	882	53.0461	100.3
245.0	869	56.2467	100.7
250.0	856	59.5411	100.9
255.0	837	60.9527	100.5
260.0	794	62.3808	99.2
265.0	733	62.0393	96.7
270.0	627	61.6987	92.6
275.0	519	54.9409	86.5
280.0	476	48.5750	82.6
285.0	461	42.6010	80.2
290.0	376	37.0188	72.5
295.0	331	31.8285	67.8
300.0	281	27.0300	62.4
305.0	337	22.6234	64.7
310.0	388	18.6086	66.2
315.0	379	14.9857	63.4
320.0	268	11.8462	53.7
325.0	228	9.0753	48.3
330.0	243	6.6731	46.6
335.0	166	4.6394	37.5
340.0	173	2.9743	34.6
345.0	133	1.6779	26.7
350.0	301	.7500	32.6
355.0	359	.7500	35.7

EXHIBIT III

DISTANCE TO PROPOSED INTERFERING CONTOUR

CHANNEL 233C 75 kW MAXIMUM (DIRECTIONAL ANTENNA)

VANCOUVER, BRITISH COLUMBIA

AUGUST 1995

DISTANCES TO CONTOURS (Kilometers):

Frequency: 94.5000 MHz
Coordinates: N 49 21 29 W 122 57 9
F(50,10) Curves Number of Contours: 1

AZ (degs)	HAAT (m)	ERP (kW)	CONTOUR LEVELS (dBu): 40.0
.0	297	.7500	81.7
5.0	99	.9259	59.0
10.0	-98	1.1204	37.3
15.0	-2	1.3333	39.6
20.0	247	1.5648	86.8
25.0	255	1.8148	89.7
30.0	339	2.0833	100.1
35.0	461	2.3704	116.4
40.0	442	2.6759	116.4
45.0	388	3.0000	112.2
50.0	389	4.4084	118.8
55.0	446	6.0871	130.8
60.0	495	8.0360	140.8
65.0	551	10.2552	149.8
70.0	499	12.7445	149.4
75.0	543	15.5041	156.5
80.0	539	18.5340	159.5
85.0	550	21.8340	163.2
90.0	580	25.4043	167.7
95.0	555	30.8161	169.9
100.0	568	36.7500	173.9
105.0	601	41.8507	178.0
110.0	640	47.2827	182.9
115.0	711	53.9328	190.8
120.0	782	61.0203	197.9
125.0	831	67.0478	202.9
130.0	874	73.3591	207.9
135.0	901	74.1773	210.0
140.0	894	75.0000	209.8
145.0	886	73.2849	208.7
150.0	883	71.5897	207.9

155.0	872	66.1995	205.2
160.0	879	61.0203	203.6
165.0	876	59.6079	202.9
170.0	879	58.2121	202.5
175.0	886	58.8747	203.2
180.0	889	59.5411	203.7
185.0	886	60.9527	204.1
190.0	876	62.3808	204.0
195.0	861	63.8255	203.6
200.0	864	65.2867	204.4
205.0	869	62.3808	203.6
210.0	873	59.5411	202.7
215.0	878	55.6637	201.3
220.0	885	51.9168	200.1
225.0	892	49.5727	199.4
230.0	899	47.2827	198.7
235.0	890	50.1230	199.6
240.0	882	53.0461	200.4
245.0	869	56.2467	201.1
250.0	856	59.5411	201.7
255.0	837	60.9527	201.1
260.0	794	62.3808	199.1
265.0	733	62.0393	195.3
270.0	627	61.6987	188.4
275.0	519	54.9409	178.7
280.0	476	48.5750	173.0
285.0	461	42.6010	169.3
290.0	376	37.0188	158.2
295.0	331	31.8285	148.5
300.0	281	27.0300	139.0
305.0	337	22.6234	141.8
310.0	388	18.6086	144.2
315.0	379	14.9857	138.7
320.0	268	11.8462	120.4
325.0	228	9.0753	110.7
330.0	243	6.6731	107.1
335.0	166	4.6394	92.5
340.0	173	2.9743	87.0
345.0	133	1.6779	73.0
350.0	301	.7500	82.1
355.0	359	.7500	87.8

EXHIBIT IV

DISTANCE TO PROPOSED SERVICE CONTOURS

CHANNEL 233A 94.5 mHz

SHELTON, WASHINGTON

AUGUST 1995

DISTANCES TO CONTOURS (Kilometers):

Frequency: 94.5000 MHz
Coordinates: N 47 14 0 W 123 18 0
F(50,50) Curves Number of Contours: 1

AZ (degs)	HAAT (m)	ERP (kW)	CONTOUR LEVELS (dBu): 60.0
.0	39	6.0000	18.1
5.0	97	6.0000	27.9
10.0	126	6.0000	31.4
15.0	117	6.0000	30.4
20.0	145	6.0000	33.6
25.0	141	6.0000	33.0
30.0	142	6.0000	33.1
35.0	148	6.0000	33.8
40.0	150	6.0000	34.1
45.0	165	6.0000	35.8
50.0	165	6.0000	35.7
55.0	154	6.0000	34.6
60.0	142	6.0000	33.2
65.0	146	6.0000	33.6
70.0	151	6.0000	34.2
75.0	157	6.0000	34.9
80.0	162	6.0000	35.5
85.0	167	6.0000	36.0
90.0	172	6.0000	36.5
95.0	176	6.0000	36.9
100.0	181	6.0000	37.2
105.0	168	6.0000	36.1
110.0	164	6.0000	35.6
115.0	163	6.0000	35.5
120.0	154	6.0000	34.5
125.0	131	6.0000	31.9
130.0	112	6.0000	29.9
135.0	108	6.0000	29.3
140.0	95	6.0000	27.6
145.0	96	6.0000	27.8
150.0	105	6.0000	28.9

155.0	105	6.0000	28.9
160.0	91	6.0000	27.1
165.0	77	6.0000	25.1
170.0	83	6.0000	25.9
175.0	90	6.0000	26.9
180.0	95	6.0000	27.6
185.0	123	6.0000	31.1
190.0	140	6.0000	32.9
195.0	139	6.0000	32.9
200.0	139	6.0000	32.8
205.0	135	6.0000	32.4
210.0	139	6.0000	32.8
215.0	143	6.0000	33.3
220.0	143	6.0000	33.3
225.0	143	6.0000	33.2
230.0	143	6.0000	33.3
235.0	142	6.0000	33.2
240.0	141	6.0000	33.0
245.0	140	6.0000	32.9
250.0	139	6.0000	32.8
255.0	138	6.0000	32.7
260.0	137	6.0000	32.6
265.0	136	6.0000	32.5
270.0	134	6.0000	32.2
275.0	127	6.0000	31.4
280.0	111	6.0000	29.7
285.0	107	6.0000	29.2
290.0	91	6.0000	27.1
295.0	85	6.0000	26.2
300.0	73	6.0000	24.5
305.0	42	6.0000	18.7
310.0	-6	6.0000	15.9
315.0	-56	6.0000	15.9
320.0	-99	6.0000	15.9
325.0	-144	6.0000	15.9
330.0	-180	6.0000	15.9
335.0	-179	6.0000	15.9
340.0	-115	6.0000	15.9
345.0	-114	6.0000	15.9
350.0	-32	6.0000	15.9
355.0	23	6.0000	15.9

EXHIBIT V

DISTANCE TO PROPOSED INTERFERING CONTOURS

CHANNEL 233A 94.5 mHz

SHELTON, WASHINGTON

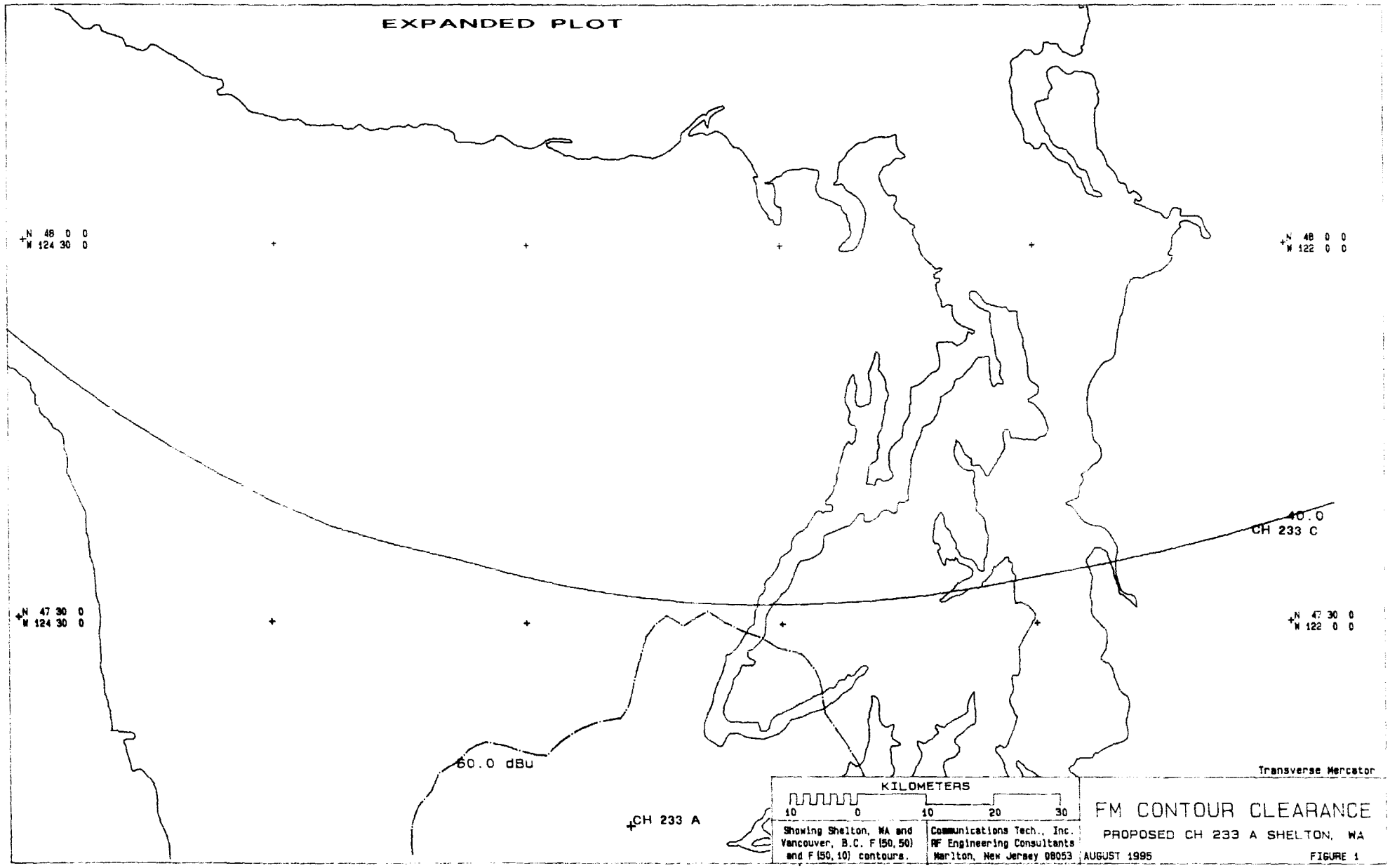
AUGUST 1995

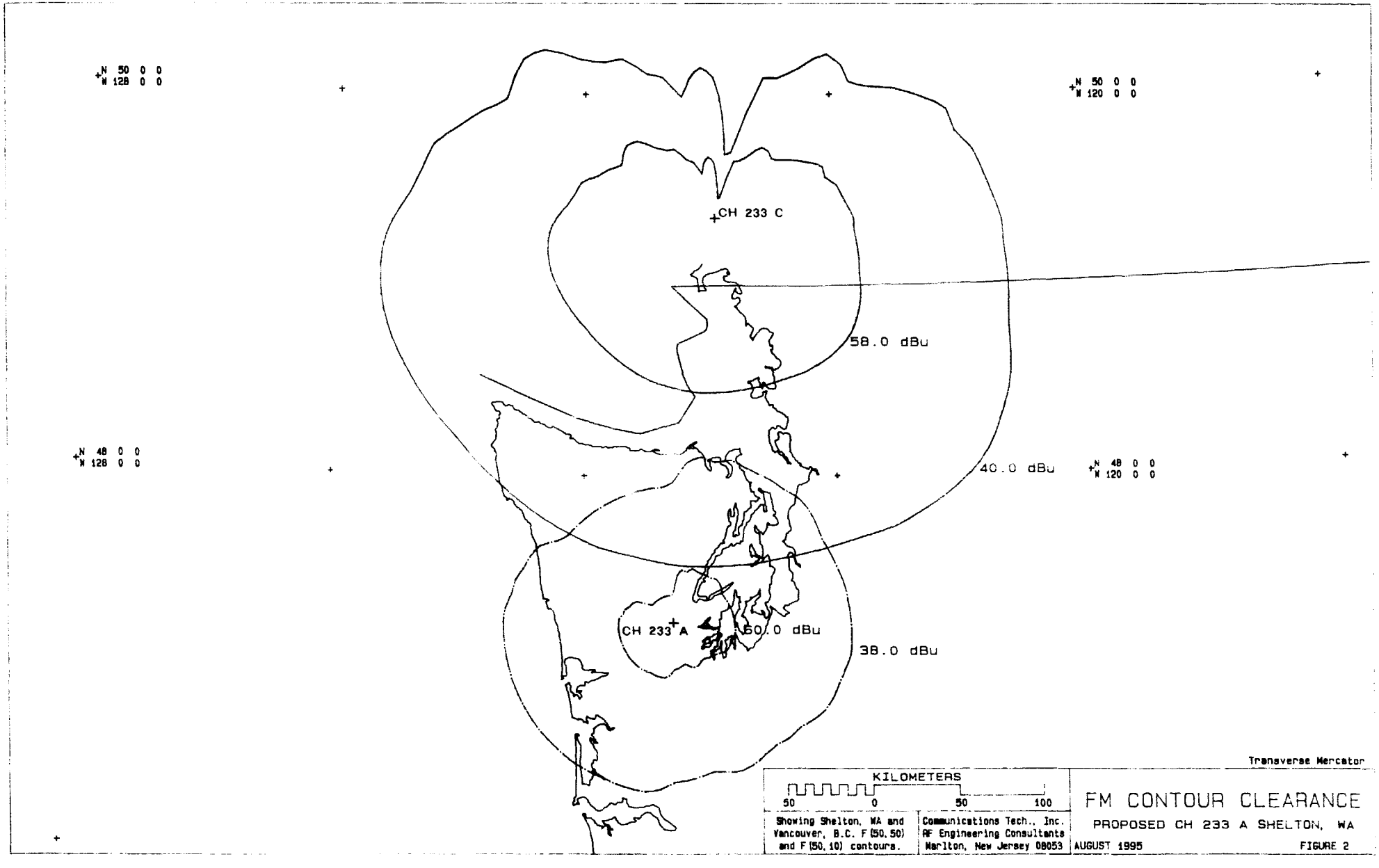
DISTANCES TO CONTOURS (Kilometers):

Frequency: 94.5000 MHz
Coordinates: N 47 14 0 W 123 18 0
F(50,10) Curves Number of Contours: 1

AZ (degs)	HAAT (m)	ERP (kW)	CONTOUR LEVELS (dBu): 38.0
.0	39	6.0000	82.1
5.0	97	6.0000	93.7
10.0	126	6.0000	98.3
15.0	117	6.0000	96.9
20.0	145	6.0000	101.1
25.0	141	6.0000	100.4
30.0	142	6.0000	100.6
35.0	148	6.0000	101.5
40.0	150	6.0000	101.9
45.0	165	6.0000	104.0
50.0	165	6.0000	103.9
55.0	154	6.0000	102.4
60.0	142	6.0000	100.7
65.0	146	6.0000	101.2
70.0	151	6.0000	101.9
75.0	157	6.0000	102.8
80.0	163	6.0000	103.6
85.0	167	6.0000	104.2
90.0	172	6.0000	104.9
95.0	176	6.0000	105.5
100.0	181	6.0000	106.0
105.0	168	6.0000	104.4
110.0	164	6.0000	103.8
115.0	163	6.0000	103.6
120.0	154	6.0000	102.4
125.0	131	6.0000	99.1
130.0	112	6.0000	96.1
135.0	108	6.0000	95.5
140.0	95	6.0000	93.3
145.0	96	6.0000	93.5
150.0	105	6.0000	94.9

155.0	105	6.0000	95.0
160.0	92	6.0000	92.7
165.0	77	6.0000	90.2
170.0	83	6.0000	91.2
175.0	90	6.0000	92.4
180.0	95	6.0000	93.3
185.0	123	6.0000	97.9
190.0	140	6.0000	100.3
195.0	139	6.0000	100.3
200.0	139	6.0000	100.2
205.0	136	6.0000	99.7
210.0	139	6.0000	100.2
215.0	143	6.0000	100.8
220.0	143	6.0000	100.8
225.0	143	6.0000	100.7
230.0	143	6.0000	100.8
235.0	143	6.0000	100.7
240.0	141	6.0000	100.4
245.0	140	6.0000	100.3
250.0	139	6.0000	100.2
255.0	138	6.0000	100.1
260.0	137	6.0000	99.9
265.0	136	6.0000	99.7
270.0	134	6.0000	99.4
275.0	127	6.0000	98.4
280.0	111	6.0000	95.9
285.0	107	6.0000	95.3
290.0	91	6.0000	92.7
295.0	85	6.0000	91.6
300.0	73	6.0000	89.5
305.0	42	6.0000	82.8
310.0	-6	6.0000	79.4
315.0	-56	6.0000	79.4
320.0	-99	6.0000	79.4
325.0	-144	6.0000	79.4
330.0	-180	6.0000	79.4
335.0	-179	6.0000	79.4
340.0	-115	6.0000	79.4
345.0	-114	6.0000	79.4
350.0	-33	6.0000	79.4
355.0	24	6.0000	79.4


EXPANDED PLOT
N 48 0 0
W 124 30 0
N 48 0 0
W 122 0 0
40.0
CH 233 C
N 47 30 0
W 124 30 0
N 47 30 0
W 122 0 0
60.0 dBu
CH 233 A
Transverse Mercator
KILOMETERS
10 0 10 20 30
Showing Shelton, WA and Vancouver, B.C. F(50,50) and F(50,10) contours.
Communications Tech., Inc.
RF Engineering Consultants
Marlton, New Jersey 08053
FM CONTOUR CLEARANCE
PROPOSED CH 233 A SHELTON, WA
AUGUST 1995
FIGURE 1


N 50 0 0
W 128 0 0
N 50 0 0
W 120 0 0
CH 233 C
58.0 dBu
40.0 dBu
N 48 0 0
W 128 0 0
N 48 0 0
W 120 0 0
CH 233 A
50.0 dBu
38.0 dBu
Transverse Mercator
KILOMETERS
50 0 50 100
Showing Shelton, WA and Vancouver, B.C. F(50,50) and F(50,10) contours.
Communications Tech., Inc.
RF Engineering Consultants
Marlton, New Jersey 08053
FM CONTOUR CLEARANCE
PROPOSED CH 233 A SHELTON, WA
AUGUST 1995
FIGURE 2

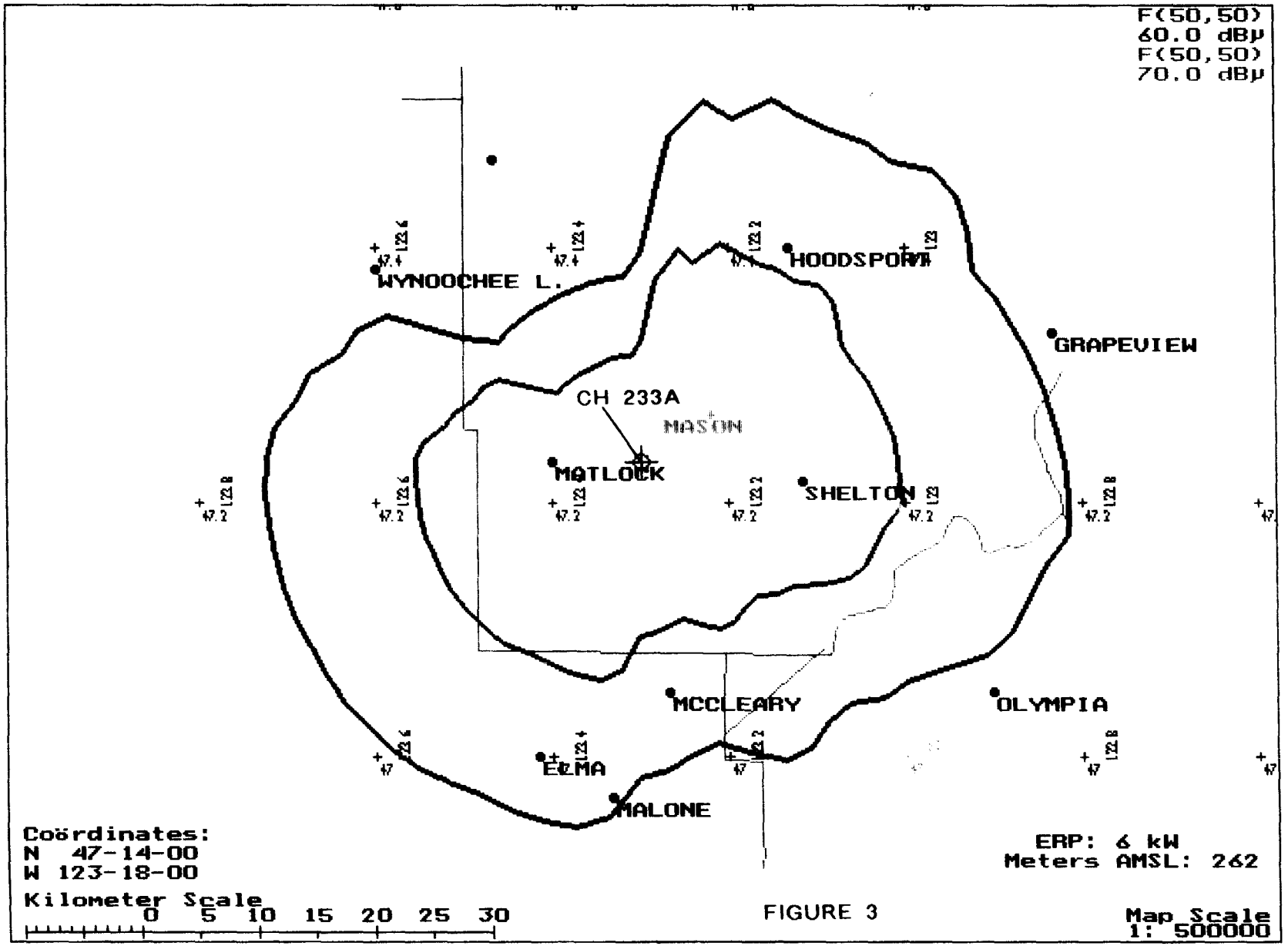


FIGURE 3

CERTIFICATE OF SERVICE

I, Veronica Abarre, a secretary in the law firm of Mullin, Rhyne, Emmons and Topel, P.C., hereby certify that I have this 6th day of September, 1995, caused to be hand delivered a copy of the foregoing "PETITION FOR RULE MAKING" to the following:

John A. Karousos
Chief, Allocations Branch
Mass Media Bureau
Federal Communications Commission
2000 M Street, N.W.--5th Floor
Washington, D.C. 20554

Veronica Abarre